REMARKS

Claims 1-35 as amended are pending in this application. Claims 1, 13-19, 21-23 and 26 have been amended.

35 U.S.C. § 101

Claims **16-25** were rejected under 35 U.S.C. 101 because the claimed invention is directed to non-statutory subject matter. Claim 16 has been amended to refer to a "storage" medium. It is respectfully requested that the 35 U.S.C. § 101 rejection be withdrawn with respect to claim 16 and its dependent claims 17-25.

35 U.S. C. § 102

Claims 13-15 were rejected under 35 U.S.C. § 102(e) as being anticipated by Vargas (US Pub. Patent Application No. 2004/0103405).

Claim 13 has been amended to include

> means for representing the extracted system model information in a generic
> reusable intermediate data format which is independent of a format used by
> the source files or the one or more target platforms.

Vargas does not disclose such means. In Vargas, the "SourceUnit DOM is a complete representation of the original SourceUnit, including its formatting." Vargas [0047]. ("The term "SourceUnit" is the smallest unit of autonomous source code which may be compiled, interpreted, or executed, depending on the capabilities of the source language." [0045]) Tagged elements are "extra information … from the original source files that typically cannot be preserved in translation." [0048]. As illustrated in Figure 1, "library 110 comprises data indicative of relationships between the first computer language source code **102** and the second computer language source code **104**." [0086]. The SourceUnit DOM discussed in paragraphs [0096] through [0110] represents the SourceUnit in the original language. The translation system (e.g., 300) of Vargas translates from the original source code to the target code based on the relationships between the original source code and the target code defined in the library 110. As described in paragraph [0030], the Vargas tool "makes use of tables and specific language knowledge" in the library between specific languages such as Java and C++. With such an architecture, there is no need, and hence no disclosure or suggestion, of a "means for representing the extracted system model information [from the source files] in a *generic* reusable intermediate data format *which is independent of a format used by the*

source files or the one or more target platforms. Therefore, claim 13 and its dependent claims 14 and 15 are patentable over Vargas. It is respectfully requested that this rejection be withdrawn.

35 U.S. C. § 103(a)

Claims 1-4, 9-12, 16, 18-23, 26-35 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Vargas in view of Chandhoke et al. (US Pub. Patent Application No. 2002/0129333). For a 35 U.S.C. 103(a) obviousness rejection, each and every element of the claims must be disclosed in the combination of the references in view of the knowledge of one of ordinary skill in the art:

Independent claim 1 was amended to include:

representing the extracted system model information in a generic
reusable intermediate data format which is independent of a format used by
the source platform code or on the one or more target platforms.

Independent claims 13, 16 and 26 were amended to include similar subject matter. Vargas was cited in each rejection for disclosing "defining a generic data structure and format for storing said extracted information; and storing said defined structure and format." As explained above in response to the 102(b) rejection, Vargas does not disclose representing the extracted system model information in a *generic reusable intermediate data format which is independent of a format used by the source platform code or on the one or more target platforms.* The combination of Vargas in view of Chandhoke does not remedy the deficient disclosure and lack of suggestion of Vargas for such a generic reusable data format. Therefore, claims 1, 13, 16 and 26 and their dependent claims are patentable over Vargas in view of Chandhoke. It is respectfully requested that this rejection be withdrawn.

35 U.S. C. § 103(a)

Claims **5-8** were rejected under 35 U.S.C. § 103(a) as being unpatentable over Vargas in view of Chandhoke as applied to claim 3 and further in view of Reid et al. (US Patent No. 6,560,592).

For claims **5-8**, the arguments with respect to Vargas in view of Chadhoke as applied to claim 3 above are applicable for showing that claims 5-8 are patentable over Vargas in view of Chadhoke and further in view of Ryan.

It is respectfully requested that this rejection be withdrawn.

35 U.S. C. § 103(a)

Claims **17, 24 and 25** were rejected under 35 U.S.C. § 103(a) as being unpatentable over Vargas in view of Chandhoke as applied to claim 3 and further in view of Li (US Patent No. 6,546,549).

For claims **17, 24 and 25**, the arguments with respect to Vargas in view of Chandhoke as applied to claim 3 above are applicable for showing that claims 17, 24 and 25 are patentable over Vargas in view of Chandhoke and further in view of Li. It is respectfully requested that this rejection be withdrawn.

<div align="center">CONCLUSION</div>

In view of the above, Applicants believe all pending claims are in condition for allowance. Allowance of these claims is respectfully requested.

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